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Reply to Office Action of July 8, 2005

REMARKS/ARGUMENTS

Claims 1, 3, 4, 7-10 and 12-18 are pending in the above identified application. The Applicants thank the Examiner for examination of the claims pending in this application and address the Examiner's comments below.

Applicants herein amend claims 1, 10 and 15 and no new claims have been added. Support for these amendments can be found generally on pages 16 -18 of the specification. These changes are believed not to introduce new matter, and their entry is respectfully requested. The claims have been amended to expedite the prosecution of the application. In making this amendment, Applicants have not and do not narrow the scope of the protection to which the Applicants consider the claimed invention to be entitled and do not concede that the subject matter of such claims was In fact disclosed or taught by the cited prior art. Rather, Applicants reserve the right to pursue such protection at a later point in time and merely seek to pursue protection for the subject matter presented in this submission.

Based on the above amendment and the following remarks, Applicant respectfully requests that the Examiner reconsider all outstanding rejections and withdraw them.

Rejection of the Claims under 35 U.S.C. §102(e)

Claims 1, 3, 4, 7-10 and 12-18 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,816,864 ("Deuser et al."). Applicants respectfully traverse these rejections in light of the following remarks.

MPEP §2131 provides:

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."

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> *Verdegall Bros. v. Union Oil Co. of California*, 814 F.2d 628,
> 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir.1987). "The
> identical invention must be shown in as complete detail as
> contained in the claim." *Richardson v. Suzuki Motor Co.*,
> 868 F.2d 1226, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir.
> 1989).

The claims as currently amended recite features lacking in the applied references. For example, independent claim 1 recites, among other things, "wherein the conversion and connection mechanism of the service provider is further configured for ... converting the at least one request document to a request string in a repeatable manner based on the coded streamed service requests, [and] for uniquely associating the conversion of the at least one request document with the client device based on the coded streamed service requests...." Deuser et al. does not disclose a system wherein requests between a client and a service provider can be coded such that subsequent requests for new services can be quickly achieved without having to recreate conversion and connection functionalities. The invention claimed by the Applicants enables service providers to simply implement calls to the conversion and connection mechanisms and to the response generators based on previously coded information so as to respond in the appropriate protocol.

Deuser et al. appears to disclose a method and system wherein a browser servlet receives requests from clients, and builds a document describing the data being requested. That document is passed to a data conversion layer that determines the actions and processes necessary for the data to be retrieved. The data conversion layer subsequently passes the request to a data store interface layer where the data is retrieved or stored as requested by the client. The data store layer operating under Lightweight Data Access Protocol (LDAP)

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performs actions on the data based on information in the servlet. Once the actions are complete, the data (page) is returned to the client. See Deuser et al., Col 4, line 52 - Col. 5, line 34. Deuser et al. does not appear to disclose a system or method, as claimed by the Applicants, that codes the client with a call to the request generator and the conversion and connection mechanism so that new services can be quickly added to the system without having to recreate new conversion and connection functionalities with each client requested service. The service providers simply have to implement calls to the serviced provider conversion and connection mechanisms and response generators.

Deuser et al. seems to disclose a system that must build and convert a document describing the requested data for each request. The conversion of the document and interface with the data storage layer consumes considerable resources that the Applicants' invention preserves.

As each and every element of a rejected claim must be found in a single piece of prior art for it to be anticipated, the rejection of claim 1 as currently pending must fail. Accordingly, the Applicants respectfully request the rejection be withdrawn. Claims 3, 4 and 7-9 depend from claim 1 and are, for at least the same reasons, not anticipated by Deuser et al.

Concerning claim 10, Deuser et al. fails to disclose all of the recited limitations of the Applicants' invention. Claim 10 recites, among other things, "wherein converting the response document is repeatable and uniquely associated with the client machine." As previously mentioned, Deuser et al. does not appear to disclose a system or process that uniquely associates clients requests with service providers so that once a streamed service request has been issued, a new service request can be repeated without reinitializing, implementing, and troubleshooting the conversion and connection processes. For at least these and the same reasons as presented with respect to claim 1,

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claim 10 is believed not to be anticipated by Deuser et al. The Applicants request the rejection be withdrawn and the claim allowed. Claims 12-14 depend from claim 10 and are, for at least the same reasons, not anticipated by Deuser et al.

With respect to claim 15, the Applicants respectfully submit Deuser et al. fails to disclose all of the claimed elements. For example, claim 15 recites, among other things, "converting the response document into a response string having a streaming form according to the data transfer protocol, wherein the data transfer protocol is associated with the client device and retained for further requests." Deuser et al. fails to disclose retaining the steps associated with the conversion process so that subsequent requests for services can occur seamlessly. Deuser et al. appears to disclose storing and converting requested data and information, but fails to disclose the association of the conversion and connection process and the response generation process with a particular client. Deuser et al. also fails to disclose the retention of these associated processes so as to streamline subsequent requests from additional and/or new services.

Each and every element of claim 15 is not disclosed by Deuser et al. Accordingly, the Applicants request the rejection of claim 15 as being anticipated by Deuser et al. be withdrawn and the claim allowed. Claims 16-18 depend from claim 15 and are, for at least the same reasons, believed not to be anticipated by Deuser et al. The Applicants request their rejections be withdrawn.

In view of all of the above, the claims are now believed to be allowable and the case in condition for allowance which action is respectfully requested. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is requested to contact Applicants' attorney at the telephone number listed below.
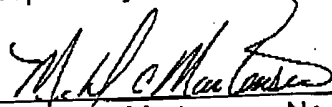
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No fee is believed due for this submittal. However, any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

Respectfully submitted,

_25 August_____, 2005

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